



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

CRH/MAA/IC
F. #2017R00906

271 Cadman Plaza East
Brooklyn, New York 11201

March 13, 2023

By ECF and Email

The Honorable Pamela K. Chen
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Hu Ji, et al.
Criminal Docket No. 21-265 (S-1) (PKC)

Dear Judge Chen:

The government writes with regard to the Court's Order, dated March 6, 2023, which directed the government to confer with relevant parties and advise the Court by March 13 whether the government anticipates needing a hearing pursuant to Section 6(a) of the Classified Information Procedures Act ("CIPA"). The government does not anticipate needing a hearing pursuant to CIPA Section 6(a) unless the relevant defendant files a notice pursuant to CIPA Section 5(a). Should the defendant determine that Section 5(a) notice is necessary, the government and relevant defendant jointly propose the following schedule:

Item	Deadline
Defendant's CIPA Section 5(a) Notice	March 27, 2023
Government's Response to CIPA Section 5(a) Notice	April 4, 2023
Defendant's Motion on Relevance and Admissibility of Materials Identified in CIPA Section 5(a) Notice	April 10, 2023
Government's Response to Relevance and Admissibility Motion	April 17, 2023
CIPA Section 6(a) Hearing	Week of April 24, 2023

Respectfully submitted,

BREON PEACE
United States Attorney

By: /s/ Craig R. Heeren
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cc: Clerk of Court (PKC) (by ECF)